

Exhibit E

JONES DAY

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Via Email

August 29, 2022

Elena Rodriguez Armenta
Elias Law Group
10 G Street NE, Suite 600
Washington, D.C. 20002

RE: August 11, 2022 Meet and Confer, *LULAC Texas et al. v. John Scott et al.*, Case No. 5:21-cv-844-XR (W.D. Tex.)

Dear Elena:

Thank you for the initial meet-and-confer call on August 11, 2022 concerning Intervenors' Responses and Objections to Plaintiffs' First Requests for Production ("Requests"). We write to respond to your August 19, 2022 letter memorializing that meeting and in the hopes that we may help facilitate future discussions as we work to accommodate Plaintiffs' Requests.

First, as requested, below please find a list of custodians from Intervenors the Republican National Committee, NRSC, NRCC, and Dallas County Republican Party. These are the individuals with those committees identified as most likely to possess information responsive to Plaintiffs' Requests. We continue to work with the Harris County Republican Party to identify its custodians most likely to possess such information and will provide you that list once we are in a position to do so.

- Alexander, Stephanie, *Regional Political Director, Republican National Committee*
- Ankney, Betsy, *Political Director, NRSC*
- Bredenkoetter, Ellen, *Data Director, Republican National Committee*
- Carr, Chris, *Political Director, Republican National Committee*
- Carter Gross, Jackson, *Deputy Political Director, NRSC*
- Dailer, Mathew, *Deputy Political Director, Republican National Committee*
- Echols, Elliot, *Political Director, Republican National Committee*
- Findlay, Josh, *National Integrity Director, Republican National Committee*
- Fountain, Susan, *Executive Director, Dallas County Republican Party*
- Hitchcock, Quinton, *Texas State Director, Republican National Committee*
- Hughes, Jeremy, *Regional Political Director, Republican National Committee*
- Jefferson, Mark, *Regional Political Director, Republican National Committee*
- Johnson, Juston, *Political Director, Republican National Committee*

JONES DAY

- Johnston, David, *Regional Political Director, NRCC*
- Marting, Cole, *Regional Political Coordinator, Republican National Committee*
- Mattox, Taylor, *Texas State Director, Republican National Committee*
- Morgan, Mark, *Deputy Political Director, NRSC*
- Moskowitz, Jordan, *Regional Political Coordinator, Republican National Committee*
- Parnitzke, Brian, *Data Director, Republican National Committee*
- Richards, Justin, *Political Director, NRCC*
- Sandler, Stu, *Political Director, NRSC*
- Sexton, Drew, *Regional Political Director, Republican National Committee*
- Shannon, Wes, *Regional Political Coordinator, Republican National Committee*
- Stoddard-Hajdu, Jennifer, *Chairwoman, Dallas County Republican Party*
- Thom, Mike, *Political Director/Deputy Political Director, NRCC*
- Wilkinson, Kristy, *Texas State Director, Republican National Committee*
- Wong, Stephen, *Texas State Director, Republican National Committee*

Second, we appreciate you confirming Plaintiffs' agreement during the August 11 call "to limit their requests geographically to the State of Texas." Consistent with that acknowledgment, Intervenor intend to limit all searches and productions to documents that relate to Texas.

Third, Intervenor are in the process of crafting a reasonable set of search terms to facilitate the identification, collection, and review of documents potentially responsive to Plaintiffs' Requests that are within the files of the individual custodians. As your letter notes, Intervenor do not yet know the size or scope of the document collection or the extent to which potentially responsive documents might implicate First Amendment or other privileges. We appreciate your agreement to revisit later scope, burden, and privilege issues.

Finally, we are reviewing existing protective orders to determine whether they are appropriate to our clients' needs in the case. As we are still collecting and reviewing documents, we are not yet in an informed position to accept or decline Plaintiffs' proposal regarding the existing protective orders. We will inform you of our position on that proposal once as we are in a position to do so.

Please do not hesitate to contact me if you would like to discuss these issues further.

Regards,

/s/ John M. Gore

John M. Gore

cc: All counsel of record